

[2] From: John A Bates at ~WHC155 10/9/91 11:52AM (2584 bytes: 45 ln)  
To: Steven D Stites at ~DOE6  
cc: Roger J Landon, Bradley G Erlandson at ~WHC115, Michael J Hall  
Subject: Summary of Items Discussed During Call from WDOH

----- Message Contents -----

Steve,

Per your request, I have tried to summarize the subject items for your use. I took the opportunity when Al dropped in this a.m. to remind him that we would appreciate his contacting your office first regarding any official information, with my office as backup. He indicated that he would make extra effort to continue doing so.

There MIGHT be a letter forthcoming from Christine Gebbie and/or E. Slagle to Mr. Anderson (cc: RL) reinforcing the WDOH concerns regarding entry/access problems which must be ironed out and reaffirming that such problems will not be tolerated. Al said he is trying to dissuade his management from sending the letter, but it looks like it will go through.

The press has called Al's office asking for a FAX ASAP of the PFP audit report. Al mailed it to RL on 10/7/91 and told the press he would not FAX or send it to them until it had been received by RL.

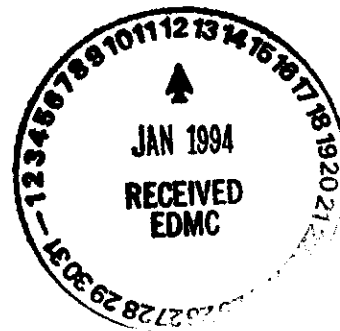
Per Al, the WDOH will be "testing" the entry/access protocol very soon after the November 1 response date for such protocol listed in his letter.

Al brought by some extra copies of the PFP report (final) this a.m. and said he was going next to your office to leave a copy. The report consistently lists a date of 1/10/92 for USDOE response to the audit items. Al said his cover letter makes it clear that those are target dates, but they are not listed as such in the audit report. Two of the earlier (draft) observations have been removed based upon discussion/clarification at the last meeting with RL/WHC/WDOH.

I will be providing the PFP folks and D. Jensen the extra copies ASAP today.

Ecology is apparently intending to establish their own Tri-Party Agreement supported Radiological Laboratory for analysis of RCRA based samples. Al is arguing strongly against such duplication, citing the RCW 70.98 which makes his office the sole authority over "things radiological."

John  
6-2088



[10] From: John A Bates at ~WHC155 10/3/91 1:54PM (6822 bytes: 48 ln, 1 fl)  
To: Steven D Stites at ~DOE6  
cc: Roger J Landon, Bradley G Erlandson at ~WHC115, Michael J Hall  
Subject: Input Regarding AZ Tank Farms Access Issue

----- Message Contents -----

Text item 1:

Steve, please see the explanation below. Also, I have attached the text as a WordPerfect File.

John

One major issue with the WDOH regarded the protocol for access. One member of the WDOH spent over 10 hours gaining access to the AZ Tank Farm to investigate a concern regarding airborne contamination control. He apparently began trying to enter the tank farm at 9:30 a.m. and did not gain entry until 7:30 p.m.

One condition of the Hanford Site operating permit issued by the WDOH is that access for inspection shall be allowed following DOE security access requirements. The regulator, who began the inspection under the impression that he had all necessary access requirements covered, was confronted with more than eight new access requirements. Some of the access requirements apparently identified were:

- 1) 40 hrs Haz Mat Training
- 2) A whole body count immediately before and after tank farm entry
- 3) Radiation Worker Training
- 4) Facility Orientation (Tank Farms)
- 5) Vendor/Visitor Orientation
- 6) A copy of the latest personal exposure history report
- 7) A 5 chip dosimeter
- 8) A physical examination or medical disclosure form

The inspector was understanding concerning the new requirements, but was frustrated that those requirements were identified "almost one at a time," by one or more key individuals each time he attempted to enter the tank farm. The WDOH indicated that other than those key individuals, the remainder of personnel involved provided positive assistance. The inspector was forced to drive to Richland three separate times. He was directed to central badging for one badging requirement, but was told at Central Badging that his badge was adequate for the entry. As agreed in an October 1, 1991, meeting between DOE-RL/ERD, WHC, PNL, and the WDOH, the DOE-RL/ERD will work with the contractors to develop an access protocol to avoid such problems. The WDOH indicated in the meeting that they were "very close to writing us up" for failure to allow reasonable access. A later contact with the WDOH indicates that the inspector may have been held to access requirements appropriate for a person routinely entering the tank farms (i.e., a Level II per WHC-CM-4-10) when the appropriate level was for a person who could occasionally enter that facility (i.e., a Level I).

A letter is being transmitted by the WDOH outlining the above access concerns. The letter calls for identification by November 1, 1991, of all applicable entry/access requirements for access to all radioactive stacks onsite.

[9] From: Dale L Halgren at ~WHC95 9/30/91 3:40PM (505 bytes: 6 ln)  
To: Michael J Hall at ~WHC155  
Receipt Requested  
Subject: AGING WASTE VENT REFERENCES

----- Message Contents -----

The following are the references from the Double Shell Tank  
Dangerous Waste Permit Application requested.

Aging Waste Ventilation - Section 4.2.8.2.2 page 4-141  
Tank Description General - Section 4.2.2.1.1 page 4-3  
AY/AZ - Section 4.2.2.1.1.4 page 4-6

[1] From: John A Bates at ~WHC155 9/23/91 2:03PM (2497 bytes: 41 ln)  
To: Bradley G Erlandson at ~WHC115  
cc: Roger J Landon  
Subject: WDOH Tour of AZ Tank Farm Riser Issue

----- Message Contents -----

Brad,

Since we have already discussed the above subject, I am forwarding the following request just to follow through. I had already typed and thought it might offer some background we hadn't covered.

RECEIVED  
B. G. ERLANDSON

Thanks again.

John

SEP 23 1991

SUBJECT: Investigation of Tank Farms Issue by WDOH

ACTION \_\_\_\_\_  
COPIES \_\_\_\_\_  
ROUTE \_\_\_\_\_  
FILE \_\_\_\_\_

The attached photo was forwarded from the Washington State Department of Health (WDOH) via telefax. Al Conklin and John Blacklaw have indicated that the WDOH needs to investigate the tank farm riser in question. John Blacklaw is scheduled to visit the site on Monday, September 30, 1991, specifically for that purpose. Your group's support would be appreciated in assisting with John's visit.

Dale Halgren and Ryan Dodd of Tank Farms have been provided a copy of the photo and a heads-up regarding the WDOH visit. They seem to be having difficulty in working from the poor quality photo so far as locating the exact riser in question. To assist, I have mailed them the original telefaxed copy I received from the WDOH. Dale's initial response to the photo was that it appeared to be a sample riser wrapped in lead foil for occupational dose shielding. He explained that the riser would be capped and would provide no emissions to the air. The sampling activity results in some residual material coating the inside of the sample riser, thus creating an exposure problem for employees working nearby unless shielding is provided.

Dale has indicated that Radiation Worker Training, the 24 Hour Hazardous Material course, and Tank Farms Orientation will be required for entry to the tank farm. John has indicated he does not have the 24 Hour training or the orientation, thus he has asked if close-up polaroid photos could be taken of the riser while he observes from outside the fence. The WDOH intends to provide the originators of the photo with a response, based upon the observations made on September 30.

John's number at WDOH is (206) 753-3350 if you should need to call and confirm times and places for the visit.

[3] From: Randall N Krekel at ~DOE6 9/26/91 10:11AM (1355 bytes: 29 ln)  
To: Diane L Clark at ~DOE8  
Receipt Requested  
cc: Michael J Hall at ~WHC155  
Subject: DOH Inspection

----- Message Contents -----

Diane,

Mike Hall from WHC Facility Compliance informed me on Thur. Sept. 26 that DOH wants to come to the site to verify the conditions of a pipe shown in a picture in Heart of America.

They want to come on Monday, Sep. 30. I don't know the details but thought you would be the correct person to deal with DOH on this. Mike and I will be on the PCB inspection Thur. and Fri.

Send me a ccMail message to let me know what your involvement will be or if someone else will be dealing with this. I will ensure that I get my mail read even tho I am on this inspection.

Mike informs me that the pipe is a riser off of Tank 101-AZ in AZ Tank farm. DOH inspectors are John (?) Blackwell and Mike Robertson out of Olympia. They have DOE badges.

Talk to Brad Erlandson in WHC facility Compliance for any additional info while Mike and I are busy with the PCB inspection.

Sorry this is so sketchy.

Thanks,

Randy Krekel